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6 *Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities*
7 *Commission and the California Office of Energy Infrastructure Safety*

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 In re:

14 PG&E CORPORATION,

15 -and-

16 PACIFIC GAS AND ELECTRIC
17 COMPANY,

18 Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 * *All papers shall be filed in the lead case,*
23 *No. 19-30088 (DM)*
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Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**AFFIDAVIT OF WILLIAM B.
ABRAMS IN SUPPORT OF MOTION
OF WILLIAM B. ABRAMS
PURSUANT TO BANKRUPTCY
RULE 5004 AND 28 U.S.C. SECTION
144 AND 455 AND BANKR. LOCAL
RULE 3-14 FOR ENTRY OF AN
ORDER AUTHORIZING THE
RECUSAL OF THE HONORABLE
DENNIS MONTALI**

1 **AFFIDAVIT OF WILLIAM B. ABRAMS IN SUPPORT OF MOTION OF WILLIAM B.**
2 **ABRAMS PURSUANT TO BANKRUPTCY RULE 5004 AND 28 U.S.C. SECTION 144 AND**
3 **455 AND BANKR. LOCAL RULE 3-14 FOR ENTRY OF AN ORDER AUTHORIZING THE**
4 **RECUSAL OF THE HONORABLE DENNIS MONTALI**

5 William B. Abrams, being duly sworn, deposes and says:

6 1. I am over 18 years of age, of sound mind and otherwise competent to make this
7 Affidavit. The evidence set out in the foregoing Affidavit is based on my personal knowledge.

8 2. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a
9 Pro Se party to promote and collaborate with core parties in good-faith towards a plan, PG&E Fire
10 Victim Trust Agreement and to ensure prudent Trust oversight that provides just settlements for all
11 claimants as well as adequate restructuring for Pacific Gas and Electric Corporation so our
12 communities are safe from the growing risks of utility-caused wildfires.

13 3. I submit this affidavit in support of the "MOTION OF WILLIAM B. ABRAMS
14 PURSUANT TO BANKRUPTCY RULE 5004 AND 28 U.S.C. SECTION 144 AND 455 AND
15 BANKR. LOCAL RULE 3-14 FOR ENTRY OF AN ORDER AUTHORIZING THE RECUSAL OF
16 THE HONORABLE DENNIS MONTALI" (the "**Motion**") filed concurrently herewith.

17 4. After the PG&E Fires of 2017, I was compelled to engage as a party to certain
18 proceedings at the California Public Utilities Commission to work collaboratively towards solutions
19 that address wildfire mitigation, climate change adaptation and other utility/energy challenges. Some
20 of these proceedings are related to this case. All of my filed comments are in the public record
21 through the Commission's website. As an intervenor in these proceedings, I have received some
22 compensation from Investor Owned Utilities including Pacific Gas and Electric Company. I have no
23 financial interests in this case that are adverse to those of victims. I have no litigation financing or
24 lines of credit tied to PG&E shareholders, bondholders or any other party in this case. I have not and
25 do not intend to get any compensation for my involvement in this case other than through my claim
26 and those claims of my family through the PG&E Fire Victim Trust. I have not engaged in activities
27 to undermine the value of the Fire Victim Trust or to slow the Trust administration process.

28 5. After recent press reports and through conducting an online public search of Judge
29 Montali's relationships with victims that received judicial review rights and remedies, I hold the
30 belief that the Honorable Dennis Montali ("**Judge Montali**") has personal biases and prejudices that
31 are reasonably considered as having interfered with the just administration of this case. I further
32 believe that Judge Montali is unable to be impartial within this case and that Judge Montali holds
33 biases against Abrams and other victims and in favor of certain parties aligned against critical
34 disclosures and discovery within this case (exp. Debtors, Certain Tort Claimant Committee Members,
35 Certain Trust Oversight Committee Members, Certain Fire Claimant Professionals).

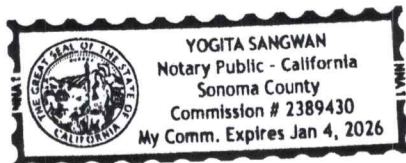
36 6. The "Exhibit B" attached to the Motion is a true and correct copy of an event
37 announcement posted on the American Bankruptcy Institute Website Journal Article, dated
38 September 13, 2022 entitled "San Francisco Members Enjoy Wine Tasting."

CALIFORNIA JURAT

GOVERNMENT CODE § 8202

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Sonoma

Subscribed and sworn to (or affirmed) before me on

this 15 day of November, 2022, by
Date Month Year(1) Yogita Sangwan, Notary Public(and (2) William Bradley Abrams),
Name(s) of Signer(s)proved to me on the basis of satisfactory evidence to
be the person(s) who appeared before me.

Place Notary Seal and/or Stamp Above

Signature

[Signature]
Signature of Notary Public**OPTIONAL**

Completing this information can deter alteration of the document or
fraudulent reattachment of this form to an unintended document.

Description of Attached DocumentTitle or Type of Document: United States Bankruptcy Court Northern District
of California San Francisco DivisionDocument Date: 11/15/2022 Number of Pages: 3

Signer(s) Other Than Named Above: _____